

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

LEGGETT & PLATT, INC.
Petitioner,

v.

NATIONAL LABOR RELATIONS
BOARD,

Respondent.

Case No. 19-1003, consolidated
with Case No. 19-1005

PETITIONER LEGGETT & PLATT, INC.’S
STATEMENT OF THE ISSUES

Pursuant to this Court’s order dated January 9, 2019, Petitioner Leggett & Platt, Inc. (“Leggett & Platt”) submits its Statement of Issues:

1. Whether the National Labor Relations Board (“NLRB”) erred in finding that Leggett & Platt violated sections 8(a)(5) and (1) of the National Labor Relations Act (“Act”) by withdrawing recognition from and refusing to bargain with International Association of Machinists Local Lodge 619.

2. Whether the NLRB erred in finding that Leggett & Platt violated sections 8(a)(5) and (1) of the Act by making changing to employees’ terms and conditions of employment following its withdrawal of recognition.

3. Whether the NLRB erred in imposing an affirmative bargaining order on Leggett & Platt.

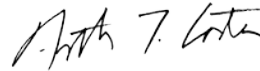
4. Whether the NLRB misapplied and failed to follow this Court's decision in *Scomas of Sausalito, LLC v. NLRB*, 849 F.3d 1147 (D.C. Cir. 2017).

5. Whether the NLRB erred in finding that Leggett & Platt violated section 8(a)(1) of the Act by allegedly providing aid to a decertification petitioner.

Dated: February 8, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to Federal Rules of Appellate Procedure 15(c) and 25(b), I hereby certify that true and correct copies of the foregoing document were served via (1) U.S. Mail and (2) the Court's CM/ECF system on this 8th day of February, 2019 upon:

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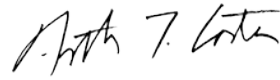
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